

From: Margo.Allmaras@ColoState.EDU
To: [Naturallyraised;](#)
CC:
Subject: FW: From Gary C. Smith
Date: Wednesday, February 28, 2007 3:14:27 PM
Attachments: [ATTACHMENT.TXT](#)

This email previously sent was from:
Gary C. Smith, Professor
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From: Allmaras,Margo
Sent: Tuesday, February 27, 2007 2:01 PM
To: 'naturallyraised@usda.gov'
Subject: From Gary C. Smith

To Whom It May Concern:

I believe the needs of consumers, as well as those of beef producers, packers, processors and retailers, would best be served by creating three categories of products from the group that has been previously labeled as “Natural.”

Products labeled as “Natural” should be required to comply with FSIS labeling constraints—“minimally processed, no additives” (or as that descriptor is modified following the present Comments Period). Such products should not be verified by use of the AMS-USDA Process Verification Program (PVP) as meeting “Natural” standards because the word (and label) would have no official AMS definition.

Products labeled as “Naturally Produced” would be required to comply with FSIS labeling constraints for “Natural” plus qualify for a PVP of the company’s choosing. To allow for diversity among “Naturally Produced” meats, claims in the PVP might—for example—include certain

animal-raising components that cover less than the animal's complete lifetime. To allow for flexibility in producing and/or marketing such products, yet have sufficient stringency to be meaningfully different to consumers, "Naturally Produced" PVPs could be required to include, at a minimum, three of six verifiable components (controlled use of antibiotics; controlled use of growth promotants; freedom to roam and/or graze; humane care and handling; not fed animal byproducts; testing of end-product and/or feed for pesticide residues). Use of such intermediate-constraint nomenclature (i.e., "Naturally Produced") would allow existing companies with loyal clientele to continue to merchandise their products without compliance to the more restrictive standards of a "Naturally Raised (Lifetime)" PVP standard.

Products labeled as "Naturally Raised (Lifetime)" would be required to comply with FSIS labeling constraints for "Natural" plus qualify for a PVP of AMS-USDA definition. AMS-USDA standards could specify any or all of six verifiable components (lifetime prohibition of use of antibiotics, lifetime prohibition of growth promotants, freedom to roam and/or graze, humane care and handling, never fed animal byproducts, mandatory testing of end-product and/or feed for pesticides). Such products could use the phrase "never ever" in merchandising to quantify claims regarding use of antibiotics, growth promotants (natural hormones, synthetic hormones and beta-agonists) and animal byproducts.

To require existing branded-beef programs to comply with the new, most stringent labeling requirements in order to continue to use the word "Natural" in marketing their products would not be fair, or just. Consumers are quite capable of understanding the nuances of differences among the three names—"Natural," "Naturally Produced," "Naturally Raised (Lifetime)"—and should be afforded the opportunity to exhibit freedom of choice in selecting such products.